

Exhibit 2

LENORA GLOVER vs MICROBILT CORPORATION

Confidential

Walter Wojciechowski on 06/18/2020

CONFIDENTIAL

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

LENORA GLOVER,	:
Plaintiff,	:
	:
vs.	:
	:
MICROBILT CORPORATION,	:
Defendant.	:No. 1:19-CV-1337

WITNESS: WALTER WOJCIECHOWSKI (VIDEO)

PAGES: 1 through 214

PLACE: Ring Central
Atlanta, Georgia

DATE: Thursday, June 18, 2020

TIME: 12:00 p.m.

Court Reporter: CELESTE PERLA, CSR, MERIT

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1 bankruptcy under confirmed plan as the end of
2 March of 2020.

3 Q. Okay. And you had earlier testified that
4 the fund is invested in loans to consumers; is
5 that correct?

6 A. No, I did not.

7 Q. Invested in lenders to consumers; is that
8 correct?

9 A. The fund invested in lenders who made loans
10 to consumers. Not the fund, the lenders. The
11 lenders did. The fund only made investments for
12 loans to lenders.

13 Q. And how much does the fund does -- have
14 invested with lenders today?

15 MR. LUCKMAN: I will object on
16 foundation grounds. You can answer.

17 THE WITNESS: Well, I am not
18 sure -- I am not sure what you are
19 asking, Kristi. Can you give me --
20 what is the question that you are
21 asking?

22 BY MS. KELLY:

23 Q. Okay. So we can break it down.

24 How many lenders does the fund
25 invest in?

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1 A. Well, the fund doesn't invest in the
2 lenders, the fund issues what is the capital
3 lines to the lenders. Currently it has four --
4 four operating lines.

5 Q. And who is the first operating line with and
6 for how much?

7 A. The first operating line would be Green
8 Circle and I am not sure for how much.

9 Q. And who is the second operating line with
10 and for how much?

11 A. The second operating line would be with,
12 it's not a company. I am not sure what the
13 entity is. Big Valley. It's called Big Valley
14 and I am not sure of the outstanding amount at
15 this point in time.

16 Q. And the third operating line, who is it with
17 and for how much?

18 A. The name would be DRT. I am not sure of the
19 amount.

20 Q. Did you say DRT?

21 A. DRT, yes.

22 Q. And what does that stand for?

23 A. I don't know. That is the name that they
24 use.

25 Q. And what is the fourth line, who is that